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06-15-07

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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the Commission's
Own Motion into the Service Quality Standards for
All Telecommunications Carriers and Revisions to
General Order 133-B.

Rulemaking 02-12-004
(Filed December 5, 2002)

DECLARATION OF MICHAEL FERNANDEZ SUPPORTING THE REPLY
COMMENTS OF VERIZON CALIFORNIA INC. AND ITS CERTIFICATED
CALIFORNIA AFFILIATES

June 15, 2007

I. PURPOSE OF DECLARATION.

1. This declaration has several purposes. First, Section II responds to doubts expressed by DRA and TURN regarding whether competition can be relied on to ensure that competitors pay sufficient attention to service quality. Based on my professional experience in the industry over the last 26 years, as well as my knowledge of specific initiatives undertaken by Verizon, it is my experience that Verizon and its competitors in California spend considerable resources monitoring, maintaining, and improving customer service because doing so is a competitive mandate. Moreover, empirical evidence confirms that such quality assurance activities are no accident: survey data overwhelmingly show that the relationship between customers' service experiences and their loyalty to their providers is very strong and that not paying sufficient attention to service quality significantly increases the likelihood that consumers will switch to alternative providers.
2. Section III analyzes some of the assumptions that DRA and TURN make regarding the service attributes that they feel are "important" or "essential" to consumers. The TURN and DRA service quality monitoring proposals are entirely arbitrary. They confirm that the concerns expressed by Dr. Aron about the competitive dangers of picking the "wrong" service metrics to monitor are well founded.
3. Section IV evaluates some of the arguments that DRA makes about the purpose for, and design of, a possible Commission-sponsored customer satisfaction

- survey. Its proposal would violate some of the key principles and best practices that I discussed in my opening declaration, and therefore would result in incomplete, inaccurate, or even misleading information. It is important to follow best practices and to make certain that any survey be carefully designed to achieve a clearly articulated purpose. With that in mind, although I do not believe there is a need for the Commission to sponsor a survey, I have listed in Exhibit A the questions that I believe would be most appropriate for achieving reliable data about customer satisfaction.
4. Finally, Section V explains that the costs of a potential Commission-sponsored survey are not limited to the important potential economic costs associated with disrupting the information market and distorting the incentives providers have to provide the service quality demanded in a competitive market. The Commission should not lose sight of the financial costs a survey would entail or the other costs associated with burdening California consumers with yet another set of requests to respond to survey questions.

II. RESPONSIVENESS TO SERVICE QUALITY ISSUES IS A COMPETITIVE IMPERATIVE.

5. In their opening comments, DRA and TURN express doubts about the ability of the competitive market to provide incentives for providers of voice communications services to pay sufficient attention to service quality. TURN (on page 7) states that “[i]t is not sufficient to entrust the job of ensuring high quality service to the marketplace and hope for the best,” and DRA (on page 1) argues that it would be “highly irresponsible” for the Commission to “abandon” its

traditional role of monitoring service quality. Based on my twenty-six years of experience in the industry and on overwhelming statistical evidence, I believe such doubts about the effectiveness of competition are ill-founded.

6. Verizon surveys its customers extensively, performing over 500,000 surveys annually. As I discussed in my opening declaration, Verizon surveys over 1,000 customers per month in California. We do such extensive surveying to develop a strong understanding of service quality issues so that we can head off problems before they materialize and improve the service that we provide our customers. Verizon takes action based on the results of these surveys. For example, our survey research reinforced for us the importance of effective communications with our customers. As a result, for installation and repair, we developed a practice requiring our service personnel to communicate with the customer at five different stages in the process. This level of communication takes time and expense, yet Verizon implemented these procedures because customers value such communication.
7. Verizon takes these actions because not doing so would negatively impact Verizon's competitiveness. My understanding is that other participants in the voice communications industry similarly have undertaken efforts to understand what their customers value and to provide service that best meets what customers demand.
8. Ensuring that service meets or exceeds customers' expectations is so engrained in the competitive culture that I generally take it as a "given" that Verizon and its

competitors will pay close attention to service quality. But the empirical data also support my personal experience: Verizon's internal surveys overwhelmingly show that customers' satisfaction with their service experiences is a very important indicator of the likelihood that a customer will defect to a competitor. For example, based on more than 3,800 interviews Verizon conducted in 2006 of its California customers, we learned that customers who rate our repair service "less than satisfactory" are *six times* more likely to switch to a different provider than those who said they were "satisfied" or "very satisfied" with their repair experiences. Verizon has found similar relationships between customers' satisfaction with other attributes, including installation experiences and product quality, and the likelihood they will leave Verizon.

9. In other words, there is simply no question, from an empirical point of view, that the competitive market requires providers to ensure that their service quality meets or exceeds customers' expectations because customer loyalty decreases substantially in the wake of decreases in the service quality attributes that customers value. Publicly available survey sources confirm Verizon's internal data regarding the relationship between customers' satisfaction with service quality and their loyalty. For example, in its July 2006 Management Report regarding its all-distance wireline customer satisfaction survey, JD Power and Associates states:

The inverse correlation between customer satisfaction (CSAT) and likelihood to switch (churn) is clearly apparent. Index scores of respondents who indicate they "definitely will switch" or "probably will switch" in the next 12 months are 80 to 135 index points below those respondents who indicate they "definitely will not" or "probably will not" switch in the next 12 months. Improved satisfaction rates correlate well

with reduced churn, improving the lifetime value of customers to their current carrier.

See J.D. Power and Associates, 2006 Residential Wireline All-Distance Satisfaction Study, Management Report (July 2006), at 107.

10. In other words, my personal experience, my analysis of Verizon's own survey data, and my review of publicly available syndicated survey data, demonstrate that competition does indeed cause providers of voice communications services to adjust their operations as necessary to supply the service quality that their customers demand. TURN and DRA are simply incorrect in their assertion (which is not based on any empirical evidence) that competition may not drive providers to ensure the service quality that their customers demand.

III. DRA AND TURN PROPOSE THAT THE COMMISSION REQUIRE PROVIDERS TO FOCUS ON MEETING SERVICE METRICS THAT ARE ENTIRELY ARBITRARY.

11. Identifying and ranking the service attributes that customers care about is a complex task. That is especially true in the voice communications industry, which is characterized by rapid technological change and intermodal competition. As Dr. Aron explained in her declaration, it is impossible for a regulator to correctly pick the particular customer service attributes on which providers should be held accountable. Aron Opening Declaration at § V-B. Also, in a competitive market, consumers benefit if different competitors are permitted to offer different portfolios of service attributes and prices. *Id.* at ¶ 25. In other words, imposing a “one size fits all” framework for service quality would not constitute good policy.
12. DRA and TURN nevertheless encourage the Commission to monitor those particular service attributes that *DRA and TURN believe* are the attributes about

which customers care the most. None of the assertions that TURN and DRA make about the service attributes that they believe are important to consumers is supported by empirical data.¹

13. Comparing and contrasting DRA's and TURN's proposals illustrates the arbitrary nature of the service attributes on which each focuses. For example, DRA believes that monitoring trouble reports is "important in accessing [sic] network reliability," and therefore concludes that establishing a mandatory floor for incidence of trouble reports is among the "absolute minimum measures essential for consumer health and safety." *See* DRA Opening Comments at 7, 9. TURN, on the other hand, believes that trouble report monitoring is unnecessary and can be eliminated. TURN Opening Comments at 21.
14. Similarly, the DRA and TURN proposals for monitoring customers' installation experiences are inconsistent. DRA would require reporting of installation commitments met, but TURN would not. DRA Opening Comments at 12. Both would require reporting installation intervals, but DRA would set the standard at 5 days, while TURN would set it at 3 days. *See* DRA Opening Comments at 12-13;

¹ TURN cites a study to support of its argument that the Commission should create a 60-second mandatory target for "average wait time to speak with a live agent." TURN Opening Comments at footnote 16. However, although I have not reviewed the study, it does not appear to represent an effort to rank different service attributes and therefore does not support TURN's proposal to arbitrarily pick average waiting time as a particularly important metric. More importantly, I do not consider the study's results relevant to this proceeding because they are over 10 years old and are based on a survey done of electricity company customers, not of customers in the competitive voice communications market.

TURN also cites CPUC data indicating that more informal disputes are resolved in favor of customers than in favor of carriers. *Id.* at footnote 19. However, TURN does not explain, and it is not evident to me, why the ratio of disputes settled in favor of one party versus another is relevant to TURN's proposed metrics regarding the supposed importance of tracking CPUC Complaints per million customers. *Id.* at 10. In any event, Verizon supports using statistics from the CPUC's informal complaint system to monitor service quality developments. *See* Verizon Opening Comments at 11-12.

TURN Opening Comments at 8. Neither DRA nor TURN offers any rationale for its particular recommendations.

15. Perhaps the most telling contrast between the TURN and DRA proposals is their different approaches to imposing an answering time standard on providers. TURN would set a 60-second goal for time spent waiting to speak with a live operator, beginning the clock when a customer chooses to speak with a live agent, and would require the Voice Recognition Unit (“VRU”) to offer the option of speaking with a live operator after 45 seconds in the system. TURN Opening Comments at 9. DRA proposes to maintain the current wireline-only standard requiring that 80% of all calls be answered within 20 seconds. DRA Opening Comments at 8. Importantly, although neither proposal is grounded in any analysis of customer preferences, each proposal would place different incentives on providers to focus their resources in particular ways. TURN’s standard would likely permit the use of a more robust and in-depth VRU that may do a better job of directing calls to specialized representatives who can fully handle the customer’s request or problem. On the other hand, DRA’s proposal would likely result in more calls being directed quickly to customer service representatives – who in turn may need to hand off the calls to more specialized operators.
16. In other words, from a customer service point of view, there is a trade-off between two different approaches to answering telephone calls. A provider can use a rapid-menu VRU and hire more customer service representatives in order to ensure that calls are answered quickly, but with a lower likelihood that representatives can resolve the customer’s issue without handing the calls off. Or

it can focus on training and retaining a smaller number of more specialized customer service representatives, and using a more robust VRU, to ensure that most customers' issues are handled right the first time. Neither TURN nor DRA present any evidence indicating that its particular proposal is the better one and that it should be imposed on consumers.²

17. Of course, the correct answer regarding how to ensure reasonable standards with respect to answering times (or any other measure potentially relevant to customer satisfaction) is that market forces should be relied on to require every provider of voice communications services to provide its customers with the level of service they demand. With respect to answering times, that means that each competitor will design its VRU and will staff its call centers based on the approach to answering customer telephone calls that it determines, in combination with other service attributes, will maximize the attractiveness of the portfolio of service attributes and price that it provides its customers. Different providers should be able to experiment with different approaches, and should not be forced to focus on meeting metrics arbitrarily imposed by a regulator.

IV. IMPLEMENTING DRA'S SURVEY PROPOSAL WOULD VIOLATE KEY PRINCIPLES THAT SHOULD GOVERN ANY COMMISSION-SPONSORED SURVEY.

18. In my opening declaration, I stressed the importance of being clear about the purpose of any survey, cognizant of its limitations, and careful to design and

² As discussed in footnote 1 above, TURN cites a 10-year old study of electricity customers that is irrelevant to this issue. It does not cite evidence that its preferred approach to answering calls is the "best" approach, or even that it is better than DRA's approach.

- conduct the survey in a way that achieves its stated purpose. I also described certain “best practices” that the Commission should consider if it does in fact choose to sponsor a customer satisfaction survey. DRA’s survey proposal violates at least two important principles that I set forth in my declaration.
19. First, one of the key limitations that I noted with respect to a potential Commission-sponsored survey is that it should not be used for enforcement purposes, such as for identifying “underperforming” service providers for which corrective measures should be considered. The risk of “false positives,” i.e., data that suggest a problem where none actually exists, would be too great, especially given the subjective nature of the customer satisfaction questions and the fact that perceptions of service quality are difficult to measure in an intermodal context. *See* Fernandez Opening Declaration at ¶¶ 33-35.
20. I therefore recommend that the Commission reject DRA’s proposal that “[p]oor survey results should require Commission attention.” If the Commission does choose to sponsor a survey, it should make clear that the results will not be used for enforcement purposes. Even leaving the perception that the results may be used in such a manner could have a chilling effect on competition because firms – at least those firms subject to Commission jurisdiction – would scramble to find ways to perform well in the *Commission’s survey* as opposed to concentrating on maximizing their customers’ welfare. *See* Aron Opening Declaration at § VI.
21. Second, one of the most important “best practices” that I described in my opening declaration was that the Commission should resist any impulse to seek overly-

- detailed data about particular service attributes. I explained that such details are irrelevant to comparing customer satisfaction across intermodal platforms, would result in data of questionable accuracy, and could lead to misleading conclusions about competitive dynamics in the industry. *See* Fernandez Opening Declaration at ¶¶ 26-28, 37.
22. Although DRA is vague about the specific survey questions it would propose, it appears to contemplate detailed questions that would violate these best practices. For example, for wireline carriers, one of the measures on which DRA's proposed survey would focus is answering times. Most respondents, however, are unlikely to recall accurate answering time information about the last time they contacted their provider, so the responses likely would be too impressionistic and unreliable. Also, DRA's proposal would drill down on different service attributes for different intermodal providers, which would not produce data that could be compared across intermodal platforms. *See* DRA Opening Comments at 6. Accordingly, I recommend that if the Commission chooses to sponsor a customer satisfaction survey, it reject DRA's proposal and ensure that the survey focuses on the overall relationship between the provider and customer, asking high-level questions that permit comparison of different providers. *See* Fernandez Opening Declaration at ¶¶ 22-28, 37.
23. As I explained in paragraphs 29-32 of my opening declaration, I do not recommend that the Commission sponsor a customer satisfaction survey. Nevertheless, to avoid any confusion about the questions that would be appropriate if the Commission determines that a survey would be useful, I have

attached as Exhibit A a list of questions that would generate reliable data that could be compared across different providers. These questions, or a subset of them, could be asked as an augment to the URF II survey that is already being considered.³ I recommend against increasing the number of questions or the level of detail sought.

V. FINANCIAL, SOCIAL, AND OTHER COSTS ASSOCIATED WITH A COMMISSION-SPONSORED SURVEY

24. As Dr. Aron discussed in Section VII of her opening declaration, the potential benefits of any service quality monitoring must justify the cost of such monitoring. Dr. Aron focuses on the important economic costs associated with disrupting the market for information about service quality that already exists and distorting the incentives that providers have for providing their customers with the service quality actually demanded. Although the economic costs described by Dr. Aron are the most important ones from a policy point of view, there are also other costs the Commission should consider.
25. First, the financial costs of hiring a well-qualified independent consulting firm to undertake a survey would be significant. This would be a recurring cost if the Commission envisions performing the survey on a regular basis. Given that I do not see a clear need for a Commission-sponsored survey (see paragraphs 29-32 of my opening declaration), this factor may militate against the Commission getting

³ If the Commission chooses to sponsor a customer satisfaction survey, I agree with DRA's suggestion (DRA Opening Comments at 6) that it may be useful to conduct that survey as an augment to the URF II surveys. Augmenting the URF II surveys, as opposed to sponsoring a separate freestanding survey on customer satisfaction, would likely cost the Commission less money and would ensure that the customer satisfaction data can be analyzed under the same methodological framework as the other data that the Commission is collecting regarding the competitive process.

into the survey business.

26. Second, the Commission should keep in mind that consumers value their time and privacy, and do not like being subjected to overly burdensome requests to participate in surveys. Indeed, in order to avoid overloading its customers with surveys, Verizon has a policy of not contacting any customer more frequently than once per year. Unless the Commission can articulate a clear and realistic policy purpose for which a survey is necessary, it may wish to avoid sponsoring yet another survey that would add to the significant number of telephone calls that Californians are already fielding from survey companies.
27. Also, consumers' understandable interest in not spending inordinate amounts of time responding to survey questions needs to be factored into how a survey is designed and conducted. Longer surveys typically have a greater number of instances where customers refuse to participate in the survey or begin to participate but then cut the process short.⁴ The rate of "non-responses" and "mid-terminates," in turn, can cause sample biases that may negatively affect the accuracy of the results.
28. To reduce non-response and mid-terminate rates, any survey's questions should be high-level and limited in number – which, as I discuss in Section IV, is one of

⁴ I am not familiar with any formal study on the topic, but Verizon's experience is that there is a direct relationship between mid-terminate rates and the length of our surveys. For example, recent surveys conducted by Verizon that took 10-11 minutes on average had mid-terminate rates of about 30%, whereas surveys taking 4-5 minutes had mid-terminate rates ranging from 11% to 20%. It is more challenging to analyze the relationship between the length of surveys and non-response rates because there are numerous additional variables to consider, but my anecdotal experience is that the length of survey is a relevant factor.

the “best practices” the Commission should employ anyway. A related issue is that if the Commission were to augment the URF II survey to include customer satisfaction questions, it should consider the extent to which the additional questions would frustrate consumers who are already being asked to devote a substantial amount of time to the survey. Given that the surveys already contemplated will be relatively burdensome to respondents, adding additional questions about customer satisfaction could potentially tip the balance and cause non-response and mid-terminate rates to increase. That is yet another reason (in addition to the ones described in Section IV) to keep the number of customer satisfaction questions small, such as those suggested in Exhibit A.

* * *

I declare under penalty of perjury under the laws of the state of California that the foregoing is true.

Executed in New York, New York, on June 15, 2007.

/s/ Michael M. Fernandez

Michael M. Fernandez

Exhibit A

Recommended questions if the Commission chooses to sponsor a customer satisfaction survey:

- 1. How would you rate the quality of the monthly bills provided by your company?**
- 2. How would you rate the customer service provided by your company?**
- 3. How would you rate the quality and reliability of your company's products and services?**
- 4. How would you rate your company's products & services in general?**
- 5. Considering all aspects of your relationship with your company, how would you rate their performance?**
- 6. Considering the PRICE you pay, how would you rate the value of the services you receive?**

CERTIFICATE OF SERVICE

I hereby certify that: I am over the age of eighteen years and not a party to the within entitled action; my business address is 112 Lakeview Canyon Road, CA501LB, Thousand Oaks, California 91362; I have this day served a copy of the foregoing, **DECLARATION OF MICHAEL FERNANDEZ SUPPORTING THE REPLY COMMENTS OF VERIZON CALIFORNIA INC. AND ITS CERTIFICATED CALIFORNIA AFFILIATES** by electronic mail to those who have provided an e-mail address and by U.S. Mail to those who have not, on the service list.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 15th day of June, 2007 at Thousand Oaks, California.

/s/ Jacque Lopez
JACQUE LOPEZ

CALIFORNIA PUBLIC UTILITIES COMMISSION

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